

Marlene H.Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554.

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 24, 2009

Name of company covered by this certification: Global Teldata LLC

Form 499 Filer ID: 826550

Name of signatory: Mark Lieberman

Title of signatory: Chief Operating Officer

I, Mark Lieberman , certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules .

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Mak Leeberman

Attachment

40 Shuman Blvd Naperville, IL 60563 P:(877) 484 6275 F: (866) 324 5573

How Global Teldata's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules

- Global Teldata does not release customer information to law enforcement agencies without specific approval of Chief Operating Officer. Whenever this has been done, it was in response to a verified court ordered subpoena.
- Global Teldata does not release customer information for any marketing purposes to outside companies under any conditions.
- Global Teldata releases customer information to customers over the phone only upon verification of identification. If we are mailing information, we mail it only to the address on the customer's record unless the customer has specifically asked us to do otherwise. If he makes such a request, then he must be a properly identified subscriber.
- Global Teldata doesn't make information available to customers on-line. Therefore, password procedures are unnecessary.
- All customer information is stored exclusively off site. Access is only possible through a password protected virtual private network.
- Credit card information is stored off site in encrypted format only. Credit card numbers are never displayed in their entirety even to company employees.
- Only the last 4 digits of social security numbers are available to employees of Global Teldata.
- Annually, the company reviews these rules with customer service employees.